REMARKS

Claims 1-6 and 15-20 are pending. Claims 1-6 and 15-19 stand rejected. The rejection of claim 20 has been withdrawn. Applicants thank the Examiner for the withdrawal of the rejection of claim 20.

The Final Action dated March 7, 2007 in this Application has been carefully considered. The above amendments and the following remarks are presented in a sincere attempt to place this Application in condition for allowance. Claims 1-4, 6, 15 and 17-20 are amended in this Response. Reconsideration and allowance are respectfully requested in light of the following remarks.

Amendments to the Claims

Claims 1-4, 6, 15 and 17-20 have been amended to more clearly present the invention. Support for these amendments can be found in the originally-filed application, for example, in Figures 1 and 2 and the descriptions of Figures 1 and 2 in the originally-filed specification. No new matter has been added by these amendments.

In light of the withdrawal of the prior rejection of claim 20 and the lack of any outstanding rejections, claim 20 has been rewritten in independent form to include all the limitations of base claim 15. Applicants respectfully assert that claim 20 is patentable.

Claim 20 is Not Fully Addressed

The Final Action Summary page indicates that claim 20 is rejected, but the text of the Final Action, discussing the 35 U.S.C. §§ 102, 103 and 112 rejections, does not provide any basis for the purported rejection. In a prior Office Action, dated September 29, 2006, claim 20 stood rejected only under 35 U.S.C. § 112. Specifically, paragraph 6 of the September 29, 2006 Office Action stated "a prior art rejection will not be applied to claim 20 …." That single rejection, though, has been withdrawn. Paragraph 3 of the current Final Action, dated March 7, 2007, states "the rejection [of claim 20] has been withdrawn." Therefore, claim 20 does not stand rejected, either based on cited art or otherwise.

However, the Final Action does not fully address the allowability of claim 20. Accordingly, Applicants request withdrawal of the finality of the rejections in the Final Action and further request the issuance of a new Office Action clearly identifying that claim 20 is allowed.

Rejections under 35 U.S.C. § 102

Claims 1-3 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,970,924 to Chu et al. ("Chu"). Applicants respectfully traverse these rejections.

In order to anticipate a claim, a reference must teach every element of the claim. M.P.E.P. § 2131. Moreover, for a reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, "[t]he identical invention must be shown in as complete detail as is contained in the claim" and "[t]he elements must be arranged as required by the claim." M.P.E.P. § 2131, citing *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913 (Fed. Cir. 1989) and *In re Bond,* 15 US.P.Q.2d 1566 (Fed. Cir. 1990). Applicants respectfully assert that the rejections do not satisfy these requirements.

Independent Claim 1

Independent claim 1 now recites "receiving an IP address by a user equipment (UE) …." The portion of Chu cited in the rejection does not disclose at least this limitation. Paragraph 6 of the Final Action cites column 16, lines 7-32 of Chu, alleging that "[p]erforming a reverse DNS lookup on each IP address" reads on this limitation. However, this allegation is incorrect. The cited portion of Chu teaches a reverse lookup, which "returns strings representing host names …." Chu, col. 16, lns. 10-12. Thus, Chu does not teach at least this limitation of the claim.

Independent claim 1 also recites "receiving, by the UE, a response from the visited serving network to the reverse domain name query …." The portion of Chu cited in the rejection does not disclose at least this aspect of the claim, either. Paragraph 6 of the Final Action cites the same quotation from Chu as referenced above, alleging that the act of "[p]erforming a reverse DNS lookup on each IP address" simultaneously reads on this limitation as well. However, the cited portion of Chu does not mention that a UE receives a response to the reverse domain name query from a visited serving network. Rather, Chu is silent regarding the route through which a response to "a reverse DNS lookup" is received. See Chu, col. 16, lns. 10-13 and 19-23. Thus, Chu does not teach at least this limitation of the claim, either.

Independent claim 1 also recites "appending, by the UE, the derived serving network domain name information to an application server name …." The portion of Chu cited in the rejection does not disclose at least this limitation, either. In Response to Arguments, paragraph

18.b. of the Final Action states "It would have been obvious … that a standardized application server name … have been appended to a discovered network domain name …."

Applicant notes that the Examiner is applying an incorrect standard for maintaining a 35 U.S.C. § 102(e) rejection by relying on obviousness to allege a suggestion in the cited reference. However, in addition to the lack of "complete detail as is contained in the claim" regarding whether any names have been appended by any part of a system, Chu does not teach that a derived serving network domain name information is appended to an application server name by the UE. Thus, Chu does not teach at least this limitation of the claim, either.

Independent claim 1 also recites "performing, by the UE, a domain name query as a function of the derived serving network domain name appended to the application server name …." Paragraph 6 of the Final Action cites the same section of Chu as above, alleging that the disclosure of sample router names and the mention of the "Whois" database reads on this limitation. However, this allegation is incorrect. The cited portion of Chu does not teach that a UE performs a domain name query as a function of a derived name. Thus, Chu does not teach at least this limitation of the claim, either.

Independent claim 1 also recites "receiving, by the UE, a second IP address as a function of the derived serving network domain name appended to the application server name …." Paragraph 6 of the Final Action cites the same section of Chu as above, alleging that the same act of "[p]erforming a reverse DNS lookup on each IP address" cited for at least two other claim limitations, also simultaneously reads on this separate limitation. However, this allegation is also incorrect. The cited portion of Chu does not teach that the UE receives an IP address as a function of a derived name. Thus, Chu does not teach at least this limitation of the claim, either.

Therefore, Applicants respectfully assert that Chu does not teach or suggest every element of claim 1 and further that the Examiner is using an incorrect standard in the rejection. Accordingly, Applicants request withdrawal of the 35 U.S.C. § 102(e) rejection of claim 1.

Dependent Claims 2 and 3

Dependent claims 2 and 3 depend from claim 1, and thus inherit all of the limitations of claim 1. As shown above, Chu does not teach all of the limitations of claim 1. Therefore, Chu does not teach all the limitations of claims 2 or 3. Accordingly, Applicants request withdrawal of the 35

U.S.C. § 102(e) rejections of claims 2 and 3. Moreover, these dependent claims set forth additional features and limitations not found in the cited art.

For example, claim 2 recites "receiving an IP address [by the UE] comprises receiving an IP address for the UE." Chu does not teach receiving an IP address by the UE for the UE.

Rejections under 35 U.S.C. § 103

Claims 4-6 and 15-19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chu in view of Official Notice. Applicants respectfully traverse these rejections.

In order to establish a *prima facie* case of obviousness under 35 U.S.C. § 103, three criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. M.P.E.P. § 2143. Applicants respectfully assert that the rejections do not satisfy these criteria.

Dependent Claims 4-6

Claims 4-6 depend from claim 1 and thus inherit all the limitations of claim 1. As shown above, Chu does not teach or suggest every limitation of claim 1. Official Notice is not relied upon to supply the missing limitations. Therefore, dependent claims 4-6 recite features and limitations not taught or suggested by the proffered combination of Chu and Official Notice. Accordingly, Applicants request withdrawal of the 35 U.S.C. § 103(a) rejections of claims 4-6.

Independent Claim 15

The rejection of independent claim 15 incorporates the rejection of claim 1. Final Action, para. 14. Claim 15 recites a system comprising a visiting user equipment (UE) that is configured to perform a process as discussed above with respect to claim 1. As discussed above, Chu does not teach or suggestion all the limitations of claim 1. Official Notice is not relied upon to supply the missing limitations.

In view of the foregoing, it is apparent that the cited reference does not disclose, teach or suggest the unique combination recited in claim 15. Applicants therefore submit that claim 15 is

clearly and precisely distinguishable over the cited reference in a patentable sense, and is therefore allowable over this reference and the remaining references of record. Accordingly, Applicants respectfully request that the rejection of claim 15 over Chu be withdrawn and that claim 15 be allowed.

Dependent Claims 16-19

Claims 16-19 depend from claim 15 and thus inherit all the limitations of claim 15. As shown above, the proffered combination of Chu and Official Notice does not teach or suggest every limitation of claim 15. Therefore, dependent claims 16-19 recite features and limitations not taught or suggested by the proffered combination of Chu and Official Notice. Accordingly, Applicants request withdrawal of the 35 U.S.C. § 103(a) rejections of claims 16-19. Moreover, these dependent claims set forth additional features and limitations not found in the cited art.

For example, claim 17 recites "the UE is configured to perform a reverse domain name query for the UE." Chu does not teach that the UE is configured to perform a reverse domain name query for the UE.

Conclusion

Applicants respectfully request reconsideration and withdrawal of all rejections and allowance of the pending claims.

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Applicants hereby request an extension of time for making this reply and hereby authorize the Commissioner to charge the required fee to Deposit Account No. 50-0605 of CARR LLP. Applicants do not believe that any other fees are due; however, in the event that any other fees are due, the Commissioner is hereby authorized to charge any required fees due (other than issue fees), and to credit any overpayment made, in connection with the filing of this paper to Deposit Account No. 50-0605 of CARR LLP.

Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

CARR LLP

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/Gregory W. Carr/
Gregory W. Carr
Reg. No. 31,093

CARR LLP
670 Founders Square
900 Jackson Street
Dallas, Texas 75202
Telephone: (214) 760-3030
Fax: (214) 760-3003